



**Chairperson: Bob Wyatt, NW Natural**  
**Treasurer: Frederick Wolf, DBA, Legacy Site Services for Arkema**

April 14, 2015

Kristine Koch  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, Suite 900, M/S ECL-115  
Seattle, WA 98101-3140

**Re: Inclusion of RM 6E and RM 11E Data in FS Database (Lower Willamette River,  
Portland Harbor Superfund Site, USEPA Docket No: CERCLA-10-2001-0240)**

Kristine:

As you are aware, sediment data have been collected in Portland Harbor subsequent to the 'lock down' date for new incorporation of data into the 2012 Draft FS. These data sets include data from the Early Actions at GASCO and Arkema, data collected by the City of Portland at RM 6E, and data collected at RM 11E during the Supplemental RI/FS by the River Mile 11 Group under an Administrative Order with EPA. The relevant data from the Early Action projects have subsequently been incorporated into the Portland Harbor FS database and will be utilized in the Final FS by EPA. The RM 6E and RM 11E data have not been incorporated into the FS because of uncertainty about their potential significance.

In order to assess the significance of the recent RM6E and RM11E data, the LWG added these data to the existing FS database and recalculated SMA acreages. The calculated areas are based on PCBs. The significance of the addition of the newer data was evaluated on both harbor-wide and AOPC-specific scales. Our findings showed that when evaluated on a harbor-wide scale, inclusion of the new data did not make a large difference in the total SMA acreages (see Table 1 below). However when evaluated on an AOPC-specific basis, the changes between the current FS dataset and the updated dataset are very significant as shown by reduced acreages and percent reductions in SMA size in AOPC 11, AOPC 12, and AOPC 25 shown in the Table 2 below.

**Table 1. Comparison of EPA's SMA Acreages Study Wide Using New RM 6 and 11 Sediment Data**

<b>Alternative</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>	<b>F</b>
Acres Change	-1.5	-2.1	-2.7	-3.6	-7.1
Percent Change	-1.9%	-2.0%	-1.7%	-1.4%	-1.4%

**Table 2. Comparison of EPA's SMA Acreages on an AOPC-Specific Scale Using New RM 6 and 11 Sediment Data**

AOPC	Change in Acres					Percent Change in Size of SMA				
	B	C	D	E	F	B	C	D	E	F
11	0.0	0.0	0.0	-0.9	-3.4	0%	0%	0%	-77%	-43%
12	0.0	0.0	-0.01	0.3	-0.4	0%	0%	-2%	18%	-4%
25	-1.5	-2.0	-2.6	-2.3	-2.2	-49%	-48%	-43%	-26%	-14%

### Conclusions

Based on the significance of the AOPC-specific changes resulting from the newer data, the LWG requests that EPA incorporate the recent RM 6E and RM 11E surface sediment data into the FS database and use the complete data set to update the SMA footprints in AOPCs 11, 12 and 25 (or the corresponding SDU counterpart), and use the updated SMA footprints to update costs and associated details in the AOPC-specific alternatives analysis.

Please call me with any questions you have regarding this request.

Sincerely,



Bob Wyatt

cc:

Sean Sheldrake, U.S. Environmental Protection Agency, Region 10  
Confederated Tribes and Bands of the Yakama Nation  
Confederated Tribes of the Grand Ronde Community of Oregon  
Confederated Tribes of Siletz Indians of Oregon  
Confederated Tribes of the Umatilla Indian Reservation  
Confederated Tribes of the Warm Springs Reservation of Oregon  
Nez Perce Tribe  
Oregon Department of Fish & Wildlife  
United States Fish & Wildlife  
Oregon Department of Environmental Quality  
LWG Legal  
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